

**MILMAN LABUDA LAW GROUP**  
3000 MARCUS AVENUE  
SUITE 3W8  
LAKE SUCCESS, NEW YORK 11042

TELEPHONE (516) 328-8800  
FACSIMILE (516) 328-0000

Author: Jamie S. Felsen - Member  
Direct E-Mail Address: [jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)  
Direct Dial: (516) 303-1391

**USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED**  
DOC #:  
DATE FILED: July 14, 2021

**Via ECF**

July 13, 2021

Hon. Victor Marrero, U.S.D.J.  
United States District Court Southern District of New York  
500 Pearl Street, Suite 160  
New York, NY 10007

**Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, et al.**  
**Case No.: 21-CV-03858 (VM)**

Dear Judge Marrero:

This firm represents all of the Defendants in the above-referenced matter with the exception of Trachtenberg, Rodes & Friedberg LLP (hereinafter "Star Defendants").


The Star Defendants respectfully request an extension of time until July 30, 2021 to respond to the Answer and cross-claims. This is the second request for an extension of time to respond to same. The Star Defendants' deadline to respond to the Complaint is currently July 16, 2021. All other parties haven consented to this request for an extension. The reason for this request is that John Koufakis, Sr., the founder of the Star Defendants' dealerships, passed away last week, and his family, who is involved in this litigation (including his sons who are dealer principals and his grandson who is an associate attorney assisting me in the defense of this case for the Star Defendants), is mourning his passing.

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen

cc: Counsel of Record (via ECF)

<b>Request GRANTED.</b>	
The defendants' response to the Complaint is hereby due no later than July 30, 2021.	
<b>SO ORDERED.</b>	
July 14, 2021	
DATE	
VICTOR MARRERO, U.S.D.J.	